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**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,

Plaintiff,

v.

JORGE ABRAMOVS,

Defendant.

2:21-CR-027-RFB-DJA

**United States of America's Unopposed  
Motion to Approve Sale Price and Sale  
Terms for Real Property Located at 3726  
South Las Vegas Boulevard, Unit 1803,  
Las Vegas, Clark County, Nevada**

The United States moves this Court to approve a sale of 3726 South Las Vegas Boulevard, Unit 1803, Las Vegas, Clark County, Nevada (property)<sup>1</sup> for \$495,000.

<sup>1</sup> MORE PARTICULARLY DESCRIBED AS:

PARCEL I:

UNIT ONE THOUSAND EIGHT HUNDRED THREE (1803) IN BUILDING "W" IN VEER TOWERS, AS SHOWN ON THAT CERTAIN FINAL MAP OF THE VEER TOWERS, A RESORT CONDOMINIUM SUBDIVISION ON FILE IN BOOK 142 OF PLATS, PAGE 42 (THE "MAP") AND AS SET FORTH IN THE DECLARATION OF COVENANTS, CONDITIONS AND RESTRICTIONS AND RESERVATION OF EASEMENTS FOR VEER TOWERS (THE "DECLARATION"), RECORDED MAY 03, 2010 IN BOOK 20100503 AS INSTRUMENT NO. 0002036, BOTH IN THE OFFICE OF THE COUNTY RECORDER, CLARK COUNTY, NEVADA (THE "OFFICIAL RECORDS").

PARCEL II:

AN ALLOCATED INTEREST AS A TENANT-IN-COMMON IN THE COMMON ELEMENTS OF VEER TOWERS (INCLUDING ANY ANNEXATIONS THEREOF) AS SHOWN BY THE MAP AND AS SET FORTH IN THE DECLARATION.

PARCEL III:

AN EXCLUSIVE EASEMENT APPURTENANT TO PARCELS ONE (1) AND TWO (2) DESCRIBED ABOVE, OVER AREAS DEFINED AND DESCRIBED AS LIMITED COMMON ELEMENTS, IF ANY, ALLOCATED TO PARCELS ONE (1) AND TWO (2) IN THE DECLARATION AND AS SHOWN AND DELINEATED UPON THE MAP REFERRED TO ABOVE.

1 The reasons for this request are (1) Jorge Abramovs agreed to the sale of the property  
 2 at \$495,000, (2) to authorize Doug Sawyer to sell the property for \$495,000 under the Court-  
 3 ordered interlocutory sale, (3) to stop the accruing of taxes and fees, and (4) to avoid  
 4 accidents and liability accruing against the property.

5 This Motion is made and is based on the papers and pleadings on file herein and the  
 6 attached Memorandum of Points and Authorities.

### 7 **Motion and Memorandum of Points and Authorities**

8 This Court authorized the Interlocutory Sale of the property.<sup>2</sup> Mr. Sawyer listed the  
 9 price for \$480,000. Anthony Chun and Shao Hua Chang offered \$495,000 to purchase the  
 10 property. If this Court does not approve the sale, the buyers will receive their earnest money  
 11 deposit.

12  
 13 \_\_\_\_\_  
 14 PARCEL IV:  
 15 NON-EXCLUSIVE EASEMENTS FOR ACCESS, INGRESS, EGRESS, USE AND  
 16 OTHER PURPOSES ALL DESCRIBED IN THE DECLARATION AND IN THAT  
 17 CERTAIN (A) DECLARATION OF CENTRAL PLANT EASEMENTS, DATED  
 18 DECEMBER 01, 2009 AND RECORDED DECEMBER 1, 2009 IN BOOK 20091201 AS  
 19 INSTRUMENT NO. 0002884 OF OFFICIAL RECORDS, AND AS AMENDED BY  
 20 THAT CERTAIN FIRST AMENDMENT TO DECLARATION OF CENTRAL PLANT  
 21 EASEMENTS, DATED JANUARY 7, 2010 AND RECORDED JANUARY 7, 2010 IN  
 22 BOOK 20100107 AS INSTRUMENT NO. 0000577 OF OFFICIAL RECORDS; (B)  
 23 PARKING AND ACCESS AGREEMENT, DATED APRIL 28, 2010 AND  
 24 RECORDED MAY 3, 2010 IN BOOK 20100503 AS INSTRUMENT NO. 0000515 OF  
 25 OFFICIAL RECORDS; (C) DECLARATION OF SUPPORT AND ENCROACHMENT  
 26 EASEMENTS, DATED DECEMBER 1, 2009 AND RECORDED DECEMBER 1, 2009  
 27 IN BOOK 20091201 AS INSTRUMENT NO. 0002885 OF OFFICIAL RECORDS, AND  
 28 AS AMENDED BY THAT CERTAIN FIRST AMENDMENT TO DECLARATION OF  
 SUPPORT AND ENCROACHMENT EASEMENTS, DATED JANUARY 7, 2010 AND  
 RECORDED JANUARY 07, 2010 IN BOOK 20100107 AS INSTRUMENT NO. 0000578  
 OF OFFICIAL RECORDS; AND (D) DECLARATION OF LIFE SAFETY SYSTEMS  
 EASEMENTS, DATED DECEMBER 1, 2009 AND RECORDED DECEMBER 1, 2009  
 IN BOOK 20091201 AS INSTRUMENT NO. 0002886 OF OFFICIAL RECORDS, AND  
 AS AMENDED BY THAT CERTAIN FIRST AMENDMENT TO DECLARATION OF  
 LIFE SAFETY SYSTEM EASEMENTS DATED JANUARY 7, 2010 AND  
 RECORDED JANUARY 07, 2010 IN BOOK 20100107 AS INSTRUMENT NO.  
 0000579, AND ALL IMPROVEMENTS AND APPURTENANCES THEREON, APN:  
 162-20-714-153.

<sup>2</sup> Order granting 54 Motion for an Interlocutory Order of Sale of 3726 South Las Vegas  
 Boulevard, Unit 1803, ECF No. 56.

1 If this Court approves the sale price and sale terms, the proceeds will be accounted  
 2 for and distributed according to the terms set forth herein. The escrow payments are  
 3 approximately (1) \$5,207.20 to the Clark County Treasurer pursuant to the signed  
 4 Stipulation;<sup>3</sup> (2) \$12,782.99 for HOA fees; (3) \$5,110 for title transfer and escrow costs; (4)  
 5 the broker commission at a rate of 6% of the purchase price; (5) \$720 for the Common  
 6 Interest Community fees; and (6) the remaining proceeds to the government to be held in an  
 7 interest-bearing account by the United States Marshals Service, which will constitute the  
 8 amount to be retained by the Court as a substitute res under Fed. R. Crim. P. 32.2(b)(7) and  
 9 Supp. R. G(7)(b)(iii) and (iv).


10 The government has determined that (1) neither the buyers nor any individual who  
 11 will be on the title after the completion of the sale is a felon; and (2) this sale represents an  
 12 arms-length transaction.

13 Dated: June 9, 2022.

14 JASON M. FRIERSON  
 United States Attorney

15 /s/ James A. Blum  
 16 JAMES A. BLUM  
 Assistant United States Attorney

17  
 18 IT IS SO ORDERED:

19   
 20 RICHARD F. BOULWARE  
 21 UNITED STATES DISTRICT JUDGE

22 DATED: June 11, 2022  
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28 <sup>3</sup> Stipulation, ECF No. 76.